

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PAUL JONES,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTION  
INC et al

Defendants.

Civil Action No. 4:19-cv-11093-TSH

APR 22 '21 AM 10:15 USB

PLAINTIFF MOTION FOR ENTRY OF CONFIDENTIALITY

AND PROTECTIVE ORDER

Plaintiff Paul Jones ("Plaintiff") hereby submits its Motion for Entry of a Confidentiality Agreement and Protective Order if the court grant plaintiff discovery.

INTRODUCTION

Pursuant to the Court's March 15, 2021 Order, Plaintiff hereby files this Motion for Entry of a Confidentiality Agreement and Protective Order.

LAW AND ARGUMENT

Plaintiff has a right to keep certain proprietary documents confidential. Federal Rule of Civil Procedure 26(c) provides:

*A party or any person from whom discovery is sought may move for a protective order in the court where the action is pending—or as an alternative on matters relating to a deposition, in the court for the district where the deposition will be taken. The motion must include a certification that the movant has in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute without court action. The court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense,...*

In this case, Plaintiff intends to produce documents which constitute the confidential and proprietary information related to plaintiff, Accordingly, Plaintiff seeks relief from the inadvertent or purposeful disclosure of these records to other parties, including any broad disclosure caused if the documents are attached to any court filings. Plaintiff has also conferred in a good faith attempt to obtain defendants stipulation to file the order. However, defendant has objected at this juncture of the proceedings to the entry of the order See Exhibit 1.

CONCLUSION: For the foregoing reasons, Plaintiff respectfully requests that this Honorable Court: (1) enter a Confidentiality and Protective Order; and (2) stay all discovery until a ruling is entered on Plaintiffs Motion for Confidentiality and Protective Order.

Paul Jones  
/s/ Paul Jones  
572 Park Street  
Stoughton, Ma02072  
617-939-5417  
Pj22765@gmail.com

April 21, 2021

Mark R. Reich (BBO# 553212)  
Deborah I. Ecker (BBO# 554623)  
KP Law, P.C. 101 Arch Street, 12th Floor  
Boston, MA 02110-1109  
decker@k-plaw.com, mreich@k-plaw.com  
(617) 556-0007

**CERTIFICATE PURSUANT TO LOCAL**

**RULE 7.1 & FED. R. CIV. P. 37(a)(5)(A)(i)**

I, Paul Jones, hereby certify that on Wed, April 21, 2021, I conferred in good faith to narrow the issues contained in this Motion with defendant's counsel but were unable to reach an agreement or to narrow this dispute.

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/s/ Paul Jones  
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## CERTIFICATE OF SERVICE

I Paul Jones plaintiff Certify that I have mailed a copy to defendant's attorney of record, a true and correct copy of the foregoing has been furnished via USP mail to the above-mentioned individuals On this 21<sup>st</sup> day of April 2021.

Respectfully Submitted

Paul Jones  
572 Park Street  
Stoughton, Ma02072  
617-939-5417  
Pj22765@gmail.com

April 21, 2021

*/s/ Paul Jones*

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